NEVADA DIVISION OF ENVIRONMENTAL PROTECTION

F A C T S H E E T
(pursuant to NAC 445A.874)

Permittee Name: **Payless/Allstate Car Rental**
Permit Project: **Payless/Allstate Car Rental**
Permit Number: **UNEV2000210**

A. Description of Injection

Location: The single network of ten (10) injection wells are located at 5175 Rent-A-Car Road, Las Vegas, Nevada 89119 in the NW¼ of Section 27 within T21S, R61E, MDB&M, in Clark County.

Characteristics: The injectate consists of a premanufactured, dechlorinated 3 % hydrogen peroxide solution. Injection activities will include 3 % hydrogen peroxide solution injected at no more than 150 gallons per well every quarter resulting in a cumulative quarterly injection volume of 1,500 gallons.

B. Synopsis

Payless/Allstate Car Rental facility operates as a car rental service with on-site fueling service. Two gasoline underground storage tanks (USTs) have been located at this site since 1982. Investigations have demonstrated that a release from Payless/Allstate occurred from the on-site USTs as well as an associated dispenser pump. The plume appears to have migrated and co-mingled with a petroleum hydrocarbon plume within the groundwater of a downgradient car rental facility, which is currently in active remediation of the plume.

Groundwater samples have demonstrated contaminant levels above the state action levels. (See Section C for Receiving Water Characteristics) The hydrogen peroxide solution will be injected at very low flow rates and volumes and is consequently not expected to facilitate contaminant migration. Monitoring will be required to verify that the injection activities are not causing the contamination to migrate.

A temporary permit was issued on August 11, 2000 to expedite the remediation effort.

C. Receiving Water Characteristics:

Groundwater sampling at this site has demonstrated the presence of dissolved petroleum

hydrocarbons in excess of the State and Federal action levels. The petroleum hydrocarbons are associated with a leaking UST containing unleaded gasoline.

The geology encountered during well construction at the site consists of a sequence of generally unconsolidated to locally cemented fine sand to cobble gravel occurring with subordinate pebble bearing sand to approximately 20 feet below ground surface. Groundwater is present at approximately 20 feet below ground surface and the average local gradient is estimated to be approximately 0.006 ft/ft in the northeasterly direction.

The groundwater quality at this site has demonstrated the following concentrations as determined by samples collected in March of 2000:

Constituent	Existing Groundwater Concentration	Limit
Benzene	864 ppb	5 ppb (State and Federal Limit)
Toluene	2,528 ppb	100 ppb (State Limit)
Ethylbenzene	828 ppb	100 ppb (State Limit)
Xylenes (total)	1,888 ppb	200 ppb (State Limit)
MTBE	30,600 ppb	200 ppb (Site Specific Target Level)
Iron	26 ppm	0.6 ppm (secondary standard)

TDS	2,240 ppm	1000 ppm (secondary standard)

D. **Procedures for Public Comment**

Notice of the Division's intent to issue a permit authorizing the facility to inject into the groundwater of the State of Nevada has been sent to the Las Vegas Review Journal for publication.

The notice has been mailed to interested persons on our mailing list (Please refer to Attachment B). Anyone wishing to comment on the proposed permit can do so in writing for a period of 30 days following the publication date of the said public notice. The comment period can be extended at the discretion of the Administrator. All written comments received during the comment period will be retained and considered in the final determination.

A public hearing on the proposed determination can be requested by the applicant, any affected state, any affected interstate agency, the regional administrator of EPA Region IX or any interested agency, person or group of persons.

Any public hearing determined by the Administrator to be held must be conducted in the geographical area of the proposed discharge or any other area the Administrator determines to be appropriate. All public hearings will be conducted in accordance with NAC 445A.238.

The final determination of the Administrator may be appealed to the State Environmental Commission pursuant to NRS 445A.605.

E. **Proposed Determination**

The Division has made the tentative determination to issue the proposed permit for a five year period.

F. **Proposed Limitations and Special Conditions**

PARAMETER	FREQUENCY	LOCATION	LIMITATIONS

Benzene, Toluene, Ethylbenzene, total Xylenes (BTEX), and methyl tertiary butyl ether (MTBE)	Quarterly (Samples shall be taken no sooner than 10 days following injection event)	MW-1A, MW-2, MW-3, MW-4, MW-5, MW-6 and MW-7	Monitor and Report
Dissolved Oxygen and pH	Quarterly	MW-1A, MW-2, MW-3, MW-4, MW-5, MW-6 and MW-7	Monitor and Report
Iron II	Quarterly	MW-1A, MW-2, MW-3, MW-4, MW-5, MW-6 and MW-7	Monitor and Report
Hydrogen peroxide: Concentration Volume Date Injected	Each Injection Event	MW-1A, MW-2, MW-3, MW-6, SVE-1, SVE-2, SVE-3, SVE-4, SVE-5 and SVE-6	3 % Solution with a maximum of **1,500 gallons per quarter**
Groundwater Elevation and Depth to Groundwater	Quarterly	All Project-Related Monitoring Wells	Monitor and Report

G. Rationale for Permit Requirements

The permit conditions will help to ensure that the injectate does not adversely affect the existing water quality or hydrologic regime.

Prepared by: Valerie G. King
Date: August 2000